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Attorney for Plaintiffs Dan L. Whitney,
Janet R. Hadley, Margaret Kornow-Brown,
Eric Brelle

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

DAN L. WHITNEY, JANET R. HADLEY,
MARGARET A. KORNOW-BROWN, ERIC
BRELLE,

Plaintiffs,

v.

CHARLES WURTZ, VERISCAPE, INC.,
RENEE TADLOCK, REGINA RYGELIS,
WILL ARNTZ, SAM JACOBS, GARY
BERKOWITZ, BRIAN ROE, and
DOES 1 TO 20, inclusive,

Defendants.

AND RELATED CROSS-ACTION

No. C0405232

STIPULATION AND ORDER
TO EXTEND TIME TO FILE
MOTION TO COMPEL
DISCOVERY

STIPULATION

This stipulation for an order extending time to file a
discovery motion is made because the court ordered all
discovery motions to be filed by November 21, 2006. Plaintiffs
intend to file a discovery motion before November 21, 2006.
However, counsel for plaintiffs and defendant Veriscape had a
face-to-face meet and confer on November 8, 2006. As a result

1 of that meeting, it is believed plaintiffs' motion will not be
2 necessary.

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4 Therefore, both parties request that plaintiff Whitney's
5 time to file a motion to compel further production of documents
6 on Veriscape, set 2, if necessary, be extended one month, to
7 wit: December 21, 2006. Such Stipulation will make best use of
8 judicial resources, client funds, and will promote cooperation
9 between parties.

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11 It is hereby stipulated by and between counsel for
12 plaintiffs and defendant Veriscape, that the amount of time to
13 file the above-referenced motion be extended from November 21,
14 2006, to December 21, 2006.

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16 Dated: November 14, 2006

David R. Beck
David R. Beck,
Attorney for Plaintiffs

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19 Dated: November _____, 2006

Robert Burmeister,
Attorney for Defendant
Veriscape, Inc.

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David R. Beck
David R. Beck,
Attorney for Plaintiffs

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Robert Burmeister
Robert Burmeister,
Attorney for Defendant
Veriscape, Inc.

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ORDER

IT IS HEREBY ORDERED that the time for plaintiff Whitney to file a motion for further production of documents, set 2, is extended from November 21, 2006 to December 21, 2006.

IT IS FURTHER ORDERED that counsel for plaintiffs shall serve a copy of this order on all interested parties.

Dated: November 15, 2006



Patricia Trumbull,
Judge of the United States
District Court